IN THE DISTRICT COURT OF THE VIRGIN ISLANDS DIVISION OF ST. CROIX

CLIFFORD BOYNES, et al., Plaintiffs,

Civil Action No. 2021-0253

v.

LIMETREE BAY VENTURES, LLC, et al.,

Defendants.

HELEN SHIRLEY, et al., Plaintiffs,

Civil Action No. 2021-0259

v.

LIMETREE BAY VENTURES, LLC, et al., Defendants.

MARY L. MOORHEAD, et al. Plaintiffs,

Civil Action No. 2021-0260

v.

LIMETREE BAY VENTURES, LLC, et al., Defendants.

BEECHER COTTON, et al., Plaintiffs,

Civil Action No. 2021-0261

v.

LIMETREE BAY VENTURES, LLC, et al., Defendants.

Case: 1:21-cv-00259-WAL-EAH Document #: 710 Filed: 02/07/25 Page 2 of 5

NOTICE OF DEPOSITION OF FERMIN RODRIGUEZ

To: Fermin Rodriguez

through counsel

Andrew C. Simpson

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PLEASE TAKE NOTICE that Plaintiffs in the above captioned matter ("Plaintiffs"),

through undersigned counsel, will take the deposition of Fermin Rodriguez, individually, pursuant

to the Federal Rules of Civil Procedure, for all purposes that are allowed, on February 19, 2025

at 9 a.m. Atlantic Standard Time at the offices of Lee J. Rohn & Associates, located at 56 King

Street, Third Floor, Hamilton House in Christiansted, VI, or such other location mutually agreed

to by the parties, before a Notary or some other officer authorized to administer oaths. The

deposition will be recorded by stenographic, audio, and/or video means. The deposition will also

take place via Zoom for remote participation. You are hereby invited to attend and take part as

you deem fit and proper.

Dated: January 27, 2025

BY: /s/ Kerry J. Miller

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DATED: January 27, 2025

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DATED: January 27, 2025

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DATED: January 27, 2025

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DATED: January 27, 2025 BY: /s/ Hugh Lambert

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DATED: January 27, 2025 BY: <u>/s/ Timothy W. Burns</u>

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DATED: January 27, 2025 BY: /s/ Vincent Colianni II

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DATED: January 27, 2025 BY: <u>/s/ C. Jacob Gower</u>

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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on January 27, 2025, I served the foregoing Notice upon all counsel by email and/or U.S. Mail.

/s/ Kerry J. Miller Kerry J. Miller